

Exhibit C

From: [Arbatman, Leeza](#)
To: [Geman, Rachel](#)
Cc: [OpenAICopyright](#); [KVP-OAI](#); [Alter-AI-TT@simplelists.susmangodfrey.com](#); [Christopher S. Sun](#); [Homer, Carolyn M.](#); [Lanham, John R.](#); [openaicopyrightlitigation.lwteam@lw.com](#); [Craig Smyser](#)
Subject: RE: [EXT] [AG/Alter] M&C re Pls Third & Fourth Set of RFPs
Date: Friday, September 27, 2024 11:33:04 AM
Attachments: [image001.png](#)

[EXTERNAL]



Rachel,

We disagree with your characterization below, but we are hopeful that the parties can make progress on RFPs 7-9. For clarification, in addition to what we agreed to produce in our response to the RFP, we agree to conduct a reasonable search for non-privileged documents in our possession, custody, or control discussing whether and to what extent the relevant models reproduce, distribute, display, or create derivative works of copyrighted works.

As a showing of good faith, we clarify that as part of our reasonable search, we conducted targeted searches for this material, including but not limited to information submitted through OpenAI's [copyright disputes form](#) and information regarding copyright issues reported to the anonymous tipline for employees that was recently implemented this year. We have produced all responsive documents gathered from those sources. Consistent with our discovery obligations, we will continue to produce documents responsive to these requests to the extent we come across them in our review of documents that hit on search terms.

Our response to RFP 98 is forthcoming in a separate thread.

Thank you,
Leeza

Leeza Arbatman
Associate
LArbatman@mofo.com
T +1 (925) 766-6920

**|||ORRISON
FOERSTER**

From: Geman, Rachel <rgeman@lchb.com>
Sent: Wednesday, September 25, 2024 10:40 PM
To: Arbatman, Leeza <LArbatman@mofo.com>
Cc: OpenAICopyright <OpenAICopyright@mofo.com>; KVP-OAI <KVPOAI@keker.com>; Alter-AI-TT@simplelists.susmangodfrey.com; Christopher S. Sun <CSun@keker.com>; Homer, Carolyn M. <CMHomer@mofo.com>; Lanham, John R. <JLanham@mofo.com>; openaicopyrightlitigation.lwteam@lw.com; Craig Smyser <CSmyser@susmangodfrey.com>

Subject: Re: [EXT] [AG/Alter] M&C re Pls Third & Fourth Set of RFPs

Importance: High

External Email

OAI counsel:

1. We sent you a letter a week ago about RFP No. 98 and have heard no response. Can you advise whether you can address that request on the call?

2. We sent you a letter on 9/15 about requests from the first set of requests (7-9) and have heard no response. We feel we have been more than patient, given that letter referred to earlier discussions. Please advise whether you will provide the update on what you will produce on or before Monday's call.

Sent from my iPhone

> On Sep 26, 2024, at 1:16 AM, Arbatman, Leeza <LArbatman@mofo.com> wrote:

> Join Zoom Meeting

> <https://mofo.zoom.us/j/95500492965?pwd=RitXSUJSWF5SWdDZEdGTkp0VCs3UT09>

>

> Meeting ID: 955 0049 2965

> Passcode: 24018166

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